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7 Rami Ghanem
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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES,

13 Plaintiff,

14 vs.
15

16 RAMI ASAD-GHANEM

17 Defendant.
18

Case No. CR-15-704-SJO

EX PARTE APPLICATION FOR
MEDICAL ORDER; DECLARATION
OF COUNSEL; EXHIBITS [Proposed
Order Filed Separately]

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20
21 Comes now defendant Rami Ghanem, through counsel, and applies for a medical order
22 to the Federal Bureau of Prisons for examination and treatment of the defendant.
23

24 Dated: Feb. 24, 2017 s/ H. Dean Steward

25 H. Dean Steward
26 Counsel for Defendant
27 Rami Ghanem
28

1 I. BACKGROUND AND RELIEF SOUGHT

2 Defendant has experienced a number of medical problems since he arrived at the
3 Metropolitan Detention Center in April of 2016. He has tried to resolve the issues, with
4 little luck. (Please see ex. "A", forms to MDC staff, asking for medical treatment). He
5 now seeks an order for examination and treatment for:

- 6
- 7 1. Pain and swelling in his lower extremities, possible blood circulation issues-
8 accompanying lesions on his ankle.
- 9 2. A broken and infected tooth¹.
- 10 3. Cracking skin on his hands and elsewhere.

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12 II. EFFORTS TO RESOLVE THE ISSUES

13 Mr. Ghanem has sought treatment on his own, with little done by the MDC staff.
14 He has used the required methods and forms to strongly request medical care, again
15 with little accomplished.

16 Government counsel sought to intervene in this matter, and was supplied with
17 some limited medical data regarding the defendant (See attached Ex. "B"). These
18 records show some awareness of the medical problems plaguing the defendant by
19 MDC staff, but little by way of care and treatment.

20 From the documents released by the MDC, (Ex. "B") the following has occurred
21 recently:

22

23 2-9-17	Examined by a physician's assistant- complaint of leg pain, eye infection, 24 skin issues- appears to be scheduled for an EKG and "Blood glucose"
25 2-8-17	(Unclear if this is the same exam as 2-9-17) same complaints

26

27 _____

28 ¹ I am aware that this medical issue has been pending since I took over representation more than 6 months ago.

1 III. MDC REPORT BACK TO THE COURT

2 Included in the proposed order is a requirement that the MDC medical staff
3 report back to the Court within 14 days of the signing of the order, explaining what has
4 been accomplished and what is still pending regarding Mr. Ghanem.

5
6 IV. CONCLUSION

7 For the reasons above, defendant seeks a medical order to address the issues set
8 out. He has tried to resolve the problems through proper channels, with little by way of
9 results.

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11
12 Dated: Feb. 24, 2017

s./ H. Dean Steward

13 H. Dean Steward
14 Counsel for Defendant
15 Rami Ghanem
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1 DECLARATION OF COUNSEL

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3 I, H. Dean Steward, declare:

- 4 1. I am retained counsel for defendant Rami Ghanem. I make this declaration in
5 support of his application for a medical order for examination and treatment.
6 2. The facts in the attached application are true to the best of my knowledge.

7
8 I declare under penalty of perjury that the foregoing is true and correct.

9
10 Dated: 2-24-17 /s./ H. Dean Steward

1 **CERTIFICATE OF SERVICE**

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3
4 IT IS HEREBY CERTIFIED THAT:

5 I, H. Dean Steward, am a citizen of the United States, and am at least 18 years of age.

6 My business address is 107 Avenida Miramar, Ste. C, San Clemente, CA 92672.

7
8 I am not a party to the above entitled action. On 2-24-17, I have caused service
9 of the defendant's:

10 **Ex Parte Application for Medical Order; Exhibits; Proposed Order**

11
12 On the following parties electronically by filing the foregoing with the Clerk of the
13 District Court using its ECF system, which electronically notifies counsel for that
14 party.

15
16 **AUSA Melissa Mills**

17
18
19
20 I declare under penalty of perjury that the foregoing is true and correct.

21 Executed on 2-24-17

22
23 s/ H. Dean Steward

24 H. Dean Steward